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Attorneys for Defendants, COUNTY OF LOS ANGELES, SERGIO FLORES and
THOMAS ANDERSON

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOSHUA SHAPIRO,

Plaintiff,

v.

DEPUTY SHERIFF, THOMAS
ANDERSON, in his individual
capacity, COUNTY OF LOS
ANGELES SHERIFF'S
DEPARTMENT; SGT. SERGIO
FLORES, in his individual capacity,
Defendants.

CASE NO.: CV12-06852 JAK (JEM)

ORDER ON STIPULATION FOR
PROTECTIVE
ORDER REGARDING DISCLOSURE
OF LAW ENFORCEMENT
PERSONNEL RECORDS AND
RELATED DOCUMENTS

Action Filed: August 16, 2012
Trial Date: None Set

ORDER

PURSUANT to the stipulation of the parties, and good cause appearing
there for, the following Protective Order is ordered by the Court.

Defendants shall produce the following documents:

1. Redacted, if necessary to protect non-parties and other privileged and
confidential information, copies of all records or reports filed, pending, completed,
and/or otherwise made in connection with incident involving plaintiff on January

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1 1, 2012, or a declaration of the custodian of records that no such documents exist.
2 The names and other personal identifying information as to any law enforcement
3 personnel other than employees of defendants shall be redacted from such report
4 prior to production.
5

6 2. Redacted copies of the Personnel Files of defendants as may be
7 ordered by the Court following the appropriate motion by plaintiff and an *in*
8 *camera* review by the Court.
9

10
11 IT IS FURTHER ORDERED:

12 1. Plaintiff shall not convey, transfer, publish, distribute, copy, duplicate,
13 or disseminate the records so produced, or information from such records so
14 produced, except as may be reasonably necessary for the prosecution of this
15 litigation by communicating with investigators, consultants and experts retained on
16 behalf of the plaintiff in this matter.
17

18 2. Prior to dissemination of any confidential material produced pursuant
19 to this order to investigators, consultants or experts retained on behalf of plaintiff,
20 plaintiff shall inform such persons of the terms and conditions of the order and
21 secure such person's agreement, *in writing*, to be bound by it.
22

23 3. Copies of any records produced to plaintiff pursuant to this order shall
24 be distinctively marked, provided that such marking does not obscure or obliterate
25 the content of any record and may be stamped with the following language:
26
27
28

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1 “CONFIDENTIAL – UNLAWFUL TO DUPLICATE”.

2 4. In the event of dissemination of any confidential materials produced
3 pursuant to this order, copies of said materials must also bear the following
4 language:
5

6 “CONFIDENTIAL – UNLAWFUL TO DUPLICATE”.

7
8 5. Upon final conclusion of the present litigation, *all copies* (by
9 whomever made) of materials ordered disclosed pursuant to this order shall be
10 returned to counsel for defendants, who will then return them to the appropriate
11 authorities of the Los Angeles County Sheriff’s Department or shall destroy said
12 documents, at defendants' option.
13

14 6. This Stipulation shall not preclude plaintiff from presenting any and
15 all evidence at trial, subject to all available and legitimate trial objections, and shall
16 not preclude; limit and/or interfere with the plaintiff’s rights to any and all further
17 discovery.
18

19 7. Copies of the records and information contained therein produced
20 pursuant to this order shall not be used for any other purpose than in connection
21 with this litigation.
22

23 8. In the event any party deems it necessary to file copies or a portion of
24 copies of any documents covered by the Stipulation, all parties agree to meet and
25 confer prior to filing such documents to reach an agreement or seek the court's
26 ruling, if necessary, as to whether such documents (s) shall be lodged under seal.
27
28

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9. In the event anyone shall violate or threaten to violate any terms of this Stipulation, the aggrieved party may immediately apply to obtain injunctive relief and other sanctions to this court against any such person violating or threatening to violate any of the terms of this Stipulation. This Court shall retain jurisdiction over the parties and any other persons subject to the terms of this Stipulation for the purpose of enforcing it. The Court shall have the power to impose whether penalties it deems appropriate for the violation of said Stipulation, including, but not limited, monetary and judicial sanctions and contempt.

10. The stipulated protective order shall survive the final termination of this action, to the extent that the information or documents disclosed remains confidential and does not become known to the public, and the court shall retain jurisdiction to resolve any dispute concerning the use of the information or documents disclosed herein.

11. All personal indentifying information shall be redacted without waiver to any party's rights to subsequently seek disclosure of such redacted information for good cause shown.

IT IS SO ORDERED.

DATED: March 11, 2015



Honorable John E. McDermott
United States Magistrate Judge